



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

Directive # 9420.0-38

MEMORANDUM

SUBJECT: FORMS II Lite™ Role in Tracking Superfund Sampling Data

FROM: Michael B Cook,   
Director, Office of Emergency and Remedial Response

TO: Superfund National Program Policy Managers  
Regional Science and Technology Division Directors

Purpose

The purpose of this directive is to establish the Field Operations and Records Management System (FORMS II Lite™), the Office of Emergency and Remedial Response's (OERR) sample tracking software, as a mandatory system to use on Contract Laboratory Program (CLP) samples by January 1, 2003. FORMS II Lite™ will be phased into the Superfund program for non-CLP samples by October 1, 2003 as appropriate. Regional Science and Technology Division laboratories have the option of using FORMS II Lite™ for sampling conducted by the Region for any customer, although I am strongly encouraging its use. This Directive and Directive 9240.0-2C (Tracking Superfund Non-CLP Analytical Data) are companion documents. FORMS II Lite™ can also be used to fulfill the requirements for Directive 9240.0-2C.

The background and benefits of FORMS II Lite™, suggested contract language, exemptions from the requirement, and training opportunities are provided below. All ten Regions have received training at least once and are using FORMS II Lite™. FORMS II Lite™ has been used for over 50,000 Superfund samples, at the Hart Senate Building anthrax cleanup, and for the indoor air and dust sampling and analyses of Lower Manhattan associated with the World Trade Center collapse.

Background

FORMS II Lite™ was developed to expedite sample documentation, to track samples from the field to the laboratory, and to reduce the most common documentation problems associated with sampling. Specifically, FORMS II Lite™:



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- ◆ Generates and prints sample documentation (e.g., Traffic Reports/Chain-of-Custody, bottle labels, and sample tags) in the field;
- ◆ Provides a legible document for each of the recipients of the Traffic Report/Chain-of-Custody record;
- ◆ Eliminates manual transcription errors associated with the completion of sample documentation through the "enter once, use many" philosophy; and
- ◆ Facilitates the electronic capture of sample information into Laboratory Information Management Systems (LIMS) to automate the sample login process.

Since the implementation of FORMS II Lite™ the following benefits have been documented:

- ◆ FORMS II Lite™ saves up to 15 minutes of work per sample and it has the potential to save up to \$2 million per year if used on all Superfund samples (about 240,000 analyses per year).
- ◆ As of September 30, 2002, FORMS II Lite™ was used at 62% of all the CLP samples (this is a 20% increase from the prior fiscal year). During October 2002, FORMS II Lite™ was used at 86% of all the CLP samples. During Fiscal Year 2001, the increased use of FORMS II Lite™ resulted in an average 48 percent reduction in paperwork discrepancies for all the Regions.
- ◆ The reduction in paperwork discrepancies saves resources in tracking down samplers to discern the analytical work required, reduces the frequency of samples exceeding holding times, and allows samplers more time for sample collection rather than correcting or manually filling out paperwork.
- ◆ Two of the top five sampling issues (from FY2000 to FY2001) have dropped off the top five list since the implementation of FORMS II Lite™. The issues reaching resolution are: samples listed on the Traffic Report/Chain of Custody but not received at the laboratory and samples not listed on the Traffic Report/Chain of Custody but received at the laboratory.
- ◆ FORMS II Lite™ fulfills the Non-CLP Analytical Services Tracking System requirement. (See Directive 9240.0-2C)
- ◆ FORMS II Lite™ establishes progress towards meeting the goals of the Government Paper Elimination Act.
- ◆ FORMS II Lite™ helps meet the objective of OMB's Directive which requires EPA to focus on "reproducible and documented" data for decision-making.

Attachment 1 provides a summary of FORMS II Lite™ along with software and hardware requirements.

### **Suggested Language and Requirements for EPA Contracts, Interagency Agreements, and Cooperative Agreements**

Attachment 2 provides additional details and suggested language to modify EPA contracts and Interagency Agreements. Amendments to cooperative agreements with the States and Tribes may be required to address the FORMS II Lite™ requirement or to purchase equipment. Amendments to Interagency Agreements with federal facilities for EPA-lead sites may also be needed. The language is provided to establish national consistency in overseeing sampling activities. Each Region needs to amend its major assessment and response contracts (e.g., Remedial Action Contracts (RACs), Superfund Technical Assessment and Response Team (START)) that provide sampling services. In addition, regional modifications

may be necessary to accommodate Region-specific needs. Contractors shall provide the equipment and software necessary to operate FORMS II Lite™.

Effective January 1, 2003, the contractors performing sample work for the CLP shall be required to use FORMS II Lite™ to manage sample collection, documentation, and submission of all relevant reports. The samplers shall also submit electronic Traffic Reports/Chain-of-Custody to the Sample Management Office (SMO) to automate the sample tracking process. Exceptions to the January 1, 2003 requirement should be rare (our goal is 95% Forms II Lite™ usage for the CLP) but can be waived by the Regional Sample Control Center Coordinator (RSCC) or another Regional designee who is most familiar with the sampling activities. The Region may also institute special procedures to handle situations when the use of FORMS II Lite™ is not practical. Headquarters does not need to approve individual waivers or the waiver process. Examples of acceptable waivers include small businesses conducting very limited sampling for one site such as at Brownfield sites, and substantial breakdown of equipment such as laptops, printers, or other related equipment. The RSCC should coordinate with the Project Officer and/or Contracting Officer if there is a trend in equipment problems or to address penalties for non-compliance, as appropriate. The Region will be responsible for determining alternative tracking procedures for sites that are waived from using FORMS II Lite™.

For non-CLP samples, the requirement is being phased-in by October 1, 2003. OERR is shifting many of its E-Commerce initiatives beyond the CLP and is developing web-based services that can also meet the needs of Emergency Response and Homeland Security. However, OERR also recognizes the Regional need for flexibility and recommends the Regions determine procedures for when the use of FORMS II Lite™ is not practical (e.g., emergency response). It is expected that the RACS and START contracts can be amended to require the use of FORMS II Lite™. Applicability of this requirement to other contracts (e.g., ERRS) may vary with the Region. In many cases, the same samplers are collecting samples for CLP and non-CLP analyses, and thus the contracts can be modified once for the two implementation dates.

States and Tribes accessing the CLP or using EPA services for non-CLP analyses should try to comply with the implementation dates as well. However, each Region should use their judgement on whether certain States and/or Tribes need special accommodations or an extension of the deadline. Potentially Responsible Parties have the option of using FORMS II Lite™, unless the samples (e.g., split samples) are being analyzed by EPA contractors.

### **Status of Software and Training**

FORMS II Lite™ software and training are offered at no cost to EPA personnel, EPA contractors conducting Superfund work, the States and Tribes. The software will continue to be upgraded to meet customer needs, for example, modifications are underway to accommodate Regional LIMS and web-based services. Samplers in all the Regions and some States have been trained by OERR and training requests will continue to be honored. Training has been conducted during actual sampling events to minimize work disturbance. Training is also provided via computer-based and web-based systems, a self-help web site, and the FORMS II Lite™ help desk. Training can be requested via the RSCCs or by directly contacting Willie Wong at 703-603-8846.

### **Next Steps**

Regional Contracting Officers and Project Officers will need to amend their assessment and response contracts to address the FORMS II Lite™ requirements. Site project managers need to ensure that sampling contractors use FORMS II Lite™. RSCCs or other appropriate staff overseeing sampling activities need to work closely with site managers to ensure sampling contractors are complying with the requirement. OERR will provide quarterly updates to the Regions on which samplers have been trained and are using FORMS II Lite™ for CLP samples. Willie Wong should be contacted to request software modifications.

Thank you for your cooperation in deploying FORMS II Lite™. Please contact Dana Tulis at 703-603-8993 for general policy issues including any concerns with the time frames and Willie Wong at 703-603-8846 for technical questions.

**Attachments**

**CC:**

Field and Analytical Services Teaming Advisory Committee  
Superfund Senior Regional Management and Acquisition Council  
Regional Lab Directors  
Regional Quality Assurance Managers  
CLP Project Officers  
Regional Sample Control Center Coordinators  
RACs, START, ERRS Contract Officers/Project Officers  
OERR Senior Management Team